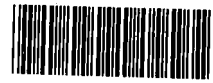


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



SEMS DocID 644620

08210002

3-18-83

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

John R. Bonniwell, President
 Philip A. Hunt Chemical Corp.
 Roosevelt Place
 Palisades Park, NJ 07650

Re: Picillo Waste Disposal Site - Coventry,
 Rhode Island; Request for Information

Dear Mr. Bonniwell:

On July 22, 1982, I sent a letter to Mr. Sid Botelho, Administrator of your Lincoln, Rhode Island facility, requesting certain information concerning the Picillo waste disposal site in Coventry, Rhode Island. This request was made for purposes of aiding the U.S. Environmental Protection Agency (EPA) in its investigation of the nature of wastes disposed of at the Picillo site and the identities of the parties whose wastes were disposed of at the site or who transported wastes to the site. A response to that request from Hunt Chemical's Providence, RI counsel, Gregory L. Benik, dated August 25, 1982, was received by EPA. The information contained therein has been of assistance to the Agency and is appreciated.

Unfortunately, certain clarifications to this response are necessary. In addition, certain other information, not limited to your Rhode Island facilities, is now required, thus necessitating my communication with you as the responsible officer for Hunt Chemical's overall operation.

Therefore, EPA requests that you provide the information requested below. Please be advised that this information request is being made pursuant to the authority of Section 3007 of the Resource Conservation and Recovery Act, 42 U.S.C. §6927, and Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §9604(e).

Specifically, we request that you provide the following information within thirty (30) days of receipt of this letter:

1) Is the statement in Hunt's August 25, 1982 letter to EPA that "no present employees at Hunt Chemical's Rhode Island facilities have any knowledge CONCURRENCES the disposal or hazardous

SYMBOL	Waste generated by Hunt Chemical at the Picillo site	nor do any
SURNAME	of the invoices for disposal of waste material	by or refer
DATE	2/23/83 2/28/83 3/2/83 3/6/83 3/7/83 3-9-	

to the Picillo site as the ultimate disposal facility..." to be understood as applicable to all Hunt facilities or only those in Rhode Island?

2) For all Hunt Chemical facilities located in Rhode Island, New Jersey and New York, specific responses are needed to those inquiries contained in my July 22, 1982 letter to Mr. Botelho, repeated here for your convenience:

- a) Between January 1, 1976 and December 31, 1977, did your company, or any of its officers, employees, agents, servants or attorneys arrange for the disposal of any hazardous wastes or substances in the State of Rhode Island?
- b) If the answer to the above inquiry is in the affirmative, identify the location of the disposal site(s) in Rhode Island at which your waste was disposed, the type(s) of waste disposed, the quantity of waste disposed, and the date(s) of disposal. Also, provide copies of all documents in the possession, custody, or control of your company or any of its officers, employees, agents, servants or attorneys which concern, refer, or relate to the shipment of such wastes to Rhode Island.
- c) Between January 1, 1976 and December 31, 1977, did your company use the services of any of the following companies or individuals to dispose, treat or recycle wastes:
- Scientific Chemical Processing, Inc. (Newark or Carlstadt, NJ)
Chemical Waste Removal, Inc. or Corp. (Bridgeport, CT)
Drums Automation, Inc. or Corp. (Danbury, CT)
C. & B Barrel, Inc. or Corp. (Danbury, CT)
Advanced Environmental Technology Corp. (Morris Plains, NJ)
Chemical Control Corp. (Elizabeth or Newark, NJ)
United Sanitation, Inc. (Cranston, RI)
Sanitary Landfill, Inc. (Cranston, RI)
A. Capuano Bros., Inc. (Cranston, RI)
Jack, Anthony, or Daniel Capuano (Cranston, RI)
Candy Box Farms Agricultural Marketing, Inc. (Coventry, RI)
Cannon Engineering, Inc. or Corp. (Bridgewater, MA)
- d) If the answer to the above inquiry is in the affirmative, provide copies of all documents in the possession, custody, or control of your company or any of its officers, employees, agents, servants or attorneys which concern, refer, or relate to the services provided by the named company or individual to your company.

Please note that the documents requested in inquiries b) and d), above, include contracts, shipping documents, bills of lading, invoices, and any other documents showing the dates of shipment,

SYMBOL								
SURNAME								
DATE								

destination of wastes or substances, number of barrels or containers, types of wastes or substances, or amounts of wastes or substances. Where positive responses are made to any inquiry, please indicate the facility to which this positive response is applicable.

3) Has any Hunt Chemical facility ever participated in or implemented a program encouraging or requiring that a deposit be placed on drums or containers and/or that empty drums or containers be returned to a Hunt Chemical facility?

4) If the answer to the above inquiry is in the affirmative, please describe such program and identify the Hunt Chemical facilities involved. Your description of such program should address the following:

- a) Did such program include the recycling or reclamation of spent ferric chloride or etchant?
- b) Did such program include the receipt by a Hunt Chemical facility of materials which could not be recycled or reclaimed?
- c) If the answer to inquiry 4b) is in the affirmative, please describe such materials and the method by which they were disposed or otherwise handled, including whether they were disposed or otherwise handled in bulk or in the returned drum or container.

This information request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §3501, et seq.

You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. §2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by the means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

Please forward the information requested above to:

Office of Regional Counsel
U.S. Environmental Protection Agency
Region I
John F. Kennedy Federal Building, Room 2203
Boston, MA 02203

Attn: Joel Blumstein CONCURRENCES

SYMBOL	SURNAME	DATE	CONCURRENCES				

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Failure to comply with the above request within thirty (30) days of receipt of this letter, or to adequately justify such failure to comply, may result in enforcement action by EPA. If you have any questions with regard to the above, please write attorney Joel Blumstein at the above address or call him at (617) 223-5779.

Sincerely yours,

Lester A. Sutton, P.E.
Regional Administrator

cc: Daniel J. Schatz, Esq.
Special Assistant Attorney General
Rhode Island

Gregory L. Benik, Esq.
Hinckley & Allen

ORC:JGB/cb/DRAFT/disc #4/2/22/83

CONCURRENCES							
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SURNAME							
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